

From: "Marilyn Kamm" <Marilyn_Kamm@law.state.ak.us>
To: <TOMM@matthewszahare.com>
Date: 4/6/2005 9:02:40 AM
Subject: Re: Fwd: Davis v Hyden, et al/M&Z File 103-2

I didn't get your letter of last week, so I haven't been ignoring you. I will contact the witnesses and respond to your questions. Also, I've been meaning to contact you about the case. Does plaintiff have a medical expert? If so, who is it?

>>> Tom Matthews <TOMM@matthewszahare.com> 4/6/2005 8:34:50 AM >>>
Marilyn,

I wrote to you last week inquiring about discovery issues. Could you let me know where things stand on these issues? I need to get these depositions scheduled. Thanks.

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>>> Tom Matthews 3/30/05 8:10:51 AM >>>
Dear Marilyn,

I'm writing on two subjects. First, I note that we have not yet received a response to our outstanding Interrogatory No. 4. Your fax to me dated January 14 indicated you were still gathering the information.

May we expect an answer shortly?

Second, I would like to schedule depositions of Mr. Hyden, Mr. Henry, and Dr. Luban. I will also send you a 30(b)(6) notice for the state to produce a witness most knowledgeable about the treatment provided to Mr. Davis, and dispensing/monitoring of medications. I suspect you may designate Dr. Luban for this purpose given your interrogatory answer.

I have a few days available the week of April 18, and then several days each the weeks of May 2 and May 9. Would you kindly let me know your preference/availability so that I can get notices out? Also, I assume that subpoenas will be necessary, but if not, please let me know. Finally, could you let me know where these depositions should be conducted from your perspective.

Thanks for your cooperation in this matter. If you have any questions, please feel free to contact me.

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